

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Ruby Freeman and Wandrea' Moss

Case No. 24-cv-6563(LJL)

Case No. 24-mc-353 (LJL)

Plaintiffs,

- against -

Rudolph W. Giuliani

Defendant.

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Defendant Rudolph W. Giuliani's Pretrial Disclosures  
Pursuant to Federal Rule of Civil Procedure 26(a)(3)

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, Defendant Rudolph W. Giuliani ("Defendant"), by his undersigned counsel, submits the following pretrial disclosures.

**I. Witnesses (Federal Rule of Civil Procedure, 26(a)(3)(i) and (ii)).**

Defendant provides the following list of potential trial witnesses for this case in chief:

## Defendant's Witnesses

Name	Address	Telephone Number	Category	Topics of Testimony	Requested Amount of Time for Direct Testimony
Rudolph W. Giuliani	315 S. Lake Drive, Apt 5-D, Palm Beach, Florida 33480	c/o Defendant's counsel	Defendant expects to present	Rudolph W. Giuliani's relocation from his New York City Cooperative Apartment to his Palm Beach County, Florida condominium as his homesteaded property.	1 hour
Maria Ryan	418 Walnut Street, Manchester, New Hampshire 03104	603-540-2451	Defendant expects to present	Rudolph W. Giuliani's relocation from his New York City Cooperative Apartment to his Palm Beach County, Florida condominium as his homesteaded property.	30 minutes
Ryan Medrano	27 Maryland Plaza, Apt 1B, St. Louis, Missouri 63108	646-509-6069	Defendant expects to present	Rudolph W. Giuliani's relocation from his New York City Cooperative Apartment to his Palm Beach County, Florida condominium as his homesteaded property.	30 minutes
Monsignor Alan Placa	200 Eagleston Estate Boulevard, Palm Beach Gardens, Florida 33418	646-241-8553	Defendant expects to present	Discussions of Rudolph W. Giuliani's relocation from his New York City Cooperative Apartment to his Palm Beach County, Florida condominium as his homesteaded property prior to 12/31/2023.	30 minutes

Michael Ragusa		917-920-0424	Defendant expects to present	Discussions of Rudolph W. Giuliani's relocation from his New York City Cooperative Apartment to his Palm Beach County, Florida condominium as his homesteaded property prior to 12/31/2023.	30 minutes
Theodore Goodman	111 West Douglass, Houghton, Michigan 49931	906-231-5849	Defendant may call if the need arises	Photographs that had been taken showing Defendant.	30 minutes

Defendant reserves the right to call additional witnesses as deemed necessary by Defendant to rebut any testimony or other evidence offered by Plaintiffs.

## **II. Documents or other exhibits (Federal Rule of Civil Procedure, 26(a)(3)(iii)).**

Defendant submits the following list of potential exhibits for his case in chief:

**Bates Stamp  
Numbered (not  
attached to court  
disclosure -  
provided directly  
to Plaintiffs'  
counsel)**

	<b>Date</b>	<b>Description of Document</b>	<b>Category</b>
Defendant's Trial Exhibit, # 001 to # 004	2/11/2010	Deed dated February 11, 2010 in the name of Rudolph W. Giuliani and Judith S. Giuliani for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida	Defendant expects to offer

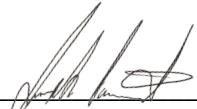
Defendant's Trial Exhibit, # 005 to # 007	1/14/2020	Deed dated January 14, 2020 in the name of Rudolph W. Giuliani for the real property located at and known as Condominium Unit 5D, 315 S. Lake Drive, Palm Beach, Florida	Defendant expects to offer
Defendant's Trial Exhibit, # 008 to # 012	7/12/2023	Exclusive Right to Sell – Cooperative Agreement between Rudolph W. Giuliani and Sotheby's International Realty dated July 12, 2023	Defendant expects to offer
Defendant's Trial Exhibit, # 013 to # 016	5/18/2024	Application for Homestead and Related Tax Exemption	Defendant expects to offer
Defendant's Trial Exhibit, # 017 to # 018	undated	Notice of Proposed Property Taxes and Proposed or Adopted Non-Ad Valorem Assessments	Defendant expects to offer
Defendant's Trial Exhibit, # 019 to # 020	undated	Real Estate Tax Bill from the Palm Beach County Tax Assessor / Collector	Defendant expects to offer
Defendant's Trial Exhibit, # 021	7/13/2024	Declaration of Domicile filed in the Office of the Palm Beach County Clerk on July 15, 2024	Defendant expects to offer
Defendant's Trial Exhibit, # 022	undated	New York State Department of Taxation and Finance confirmation of no Star Credit	Defendant expects to offer
Defendant's Trial Exhibit, # 023	8/30/2024	New York City Department of Finance confirmation of no Cooperative Condominium Abatement	Defendant expects to offer

Defendant's Trial Exhibit, # 024	2/22/2024	Florida driver's license of Rudolph W. Giuliani dated February 22, 2024	Defendant expects to offer
Defendant's Trial Exhibit, # 025	5/8/2024	Vehicle tag for 1980 Mercedes which bore Florida tag JA3414	Defendant expects to offer
Defendant's Trial Exhibit, # 026 to # 029	5/17/2024	Voter registration in the State of Florida – voter registration number 132378699 dated May 17, 2024	Defendant expects to offer
Defendant's Trial Exhibit, # 030 to # 052	undated	Personal Federal Income Tax Return for 2023 Redacted	Defendant expects to offer
Defendant's Trial Exhibit, # 053 to # 059	undated	Calendar noting Defendants' presence inside and outside the State of Florida in 2024	Defendant expects to offer
Defendant's Trial Exhibit, # 060 to # 092	various dates	Photographs	Defendant expects to offer
Defendant's Trial Exhibit, # 093 to # 142	March 1, 2024 through July 31, 2024	Bank Statements	Defendant expects to offer
Defendant's Trial Exhibit, # 143 to # 144	10/23/2024	Invoice #416642 from Corporate Transfer & Storage Inc.	Defendant expects to offer
Defendant's Trial Exhibit, # 145	10/16/2024	Invoice #416641 from Corporate Transfer & Storage Inc.	Defendant expects to offer
Defendant's Trial Exhibit, # 146 to # 155	10/16/2024	Invoice #416643 from Corporate Transfer & Storage Inc.	Defendant expects to offer
Defendant's Trial Exhibit, # 156 to # 173	Closing date 2/20/2024, 7/22/2024	American Express Bills	Defendant expects to offer
Defendant's Trial Exhibit, # 174 to # 175	undated	Photograph of notes	Defendant expects to offer

The foregoing list does not include all exhibits that Defendant may use on cross-examination or on rebuttal. Defendant reserves the right to amend and/or supplement this list with additional

documents, including but not limited to any documents provided in discovery and deposition transcripts not yet available, that may become necessary exhibits at the trial.

Dated: December 23, 2024  
Staten Island, New York




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718-477-0020

I certify that I have transmitted the foregoing document via email to Plaintiffs' counsel of record.

Dated: December 23, 2024  
Staten Island, New York



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